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Canadian Vehicle
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June 14, 2002

FMCSA-2001-10886-25

Mr. Joseph M. Clapp
Administrator
Federal Motor Carrier Safety Administration
400 Seventh Street, SW
Washington, DC 20590

Dear Mr. Clapp:

REFERENCE: 49CFR Part 393: Parts and Accessories Necessary for Safe Operation: Certification of Compliance with Federal Motor Vehicle Safety Standards, Notice of Proposed Rulemaking; Request for Comments [Docket No. FMCSA-01-10886]

The Canadian Vehicle Manufacturers' Association (CVMA) and its associated members, DaimlerChrysler Canada, Ford Motor Company of Canada, General Motors of Canada and International Truck and Motor Company of Canada, write in support of the letter of response to the above reference NPRM, that you received on May 10, 2002 from the Truck Manufacturers Association (TMA).

The CVMA members, as with the TMA members, support your effort to ensure that commercial vehicles manufactured for the Canadian market that operate on US highways, operate to the same level of safety standard as those vehicles manufactured for the US market. Further, with our standards being very similar, with only minor differences, we would expect that this would already be the situation from a practical standpoint.

The introduction of rulemaking will most likely not give you the desired reduction in safety related incidents that your organization is focused on addressing. Data supports that the greatest opportunity for continuous improvement for safety related issues lies in the area of Truck maintenance. Canadian efforts are directed towards enforcement of safety standards. The Province of Ontario, for example, has adopted some of the toughest truck safety measures in North America, including (but not inclusive):

- increased violation fines,
- absolute liability for wheel separations,
- vehicle impoundment programs,
- increased hours of operation for vehicle inspections



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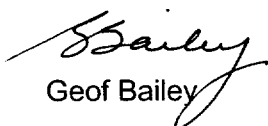
- participation in the annual, international coordinated "Road Blitz" (14 year participant)
- additional officers to support these programs

The proposed rule, should it be passed, references the "retro-active certification" of vehicles. We would submit that the safety benefits of this retroactive action would be minimal as the U.S. and Canadian standards have only minor differences. The cost to implement this action would be very high and the ability to acquire the required history/documentation very difficult. While certification is used for new vehicles, we believe your intent is that retroactive certification will include modifications to the vehicles after manufacture. Not only would this require consideration of manufacturer and secondary manufacturer records, but also an evaluation of owner modifications and repairs.

While the CVMA members do not usually comment on U.S. NPRM's, you will understand why we submit our comments on this specific Docket and why we support the submission by the Truck Manufacturers Association (TMA).

If our association can be of any help in further analysis of this proposal, please do not hesitate to contact me.

Yours sincerely,


Geof Bailey

Vice President
Vehicle Safety and Standards Development
Canadian Vehicle Manufacturers' Association